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UPMANN SANCHEZ TURF AND LANDSCAPE

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UPMANN SANCHEZ TURF AND
LANDSCAPE, dba US Turf

Plaintiff,

v.

US TURF LLC, dba Serenity Landscaping

Defendant.

US TURF LLC,

Counterclaimant,

v.

UPMANN SANCHEZ TURF AND
LANDSCAPE, INC.

Counter-Defendant.

Case No. 2:21-cv-01749-JCM-DJA

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF
TO FILE AN ANSWER OR
OTHERWISE RESPOND TO
DEFENDANT'S ANSWER AND
COUNTERCLAIMS**

(First Request)

1 Pursuant to Local Rules IA 6-1 and IA 6-2, Plaintiff/Counter-Defendant
2 UPMANN SANCHEZ TURF AND LANDSCAPE, INC. (“Plaintiff”) and
3 Defendant/Counterclaimant US TURF LLC (“Defendant”) hereby stipulate and agree
4 as follows:

5 1. On September 22, 2021 Plaintiff filed a Complaint with the U.S. District
6 Court, District of Nevada, bearing Case No. 2:21-cv-01749-JCM-DJA;

7 2. On October 12, 2021 Defendant was served with the Summons and
8 Complaint;

9 3. On November 2, 2021 Defendant timely filed its Answer and
10 Counterclaims;

11 4. The parties are engaged in discussions related to the allegations of the
12 Complaint and Counterclaims and jointly request an extension of the Plaintiff’s
13 deadline to file any motion and response to Defendant’s Answer and Counterclaims,
14 including a Motion to Strike or Dismiss pursuant to Federal Rules of Civil Procedure
15 12(b) and/or (f);

16 5. Therefore, the Parties stipulate and agree that the Plaintiff shall have until
17 December 7, 2021 to file any Motion and response to Defendant’s Answer and
18 Counterclaims;

19 6. This is the first request for any extension of time relating to the pleadings
20 in this case;

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1 In view of the foregoing, good cause supports this stipulation and the Parties
2 jointly request that the Court extend Plaintiff's deadline to file an Answer or otherwise
3 respond to Defendant's Answer and Counterclaims to December 7, 2021.

4 Respectfully submitted,

5 DATED: November 22, 2021

PROCOPIO, CORY, HARGREAVES &
SAVITCH LLP

8 By: /s/ Jeffery A. Garofalo

9 Jeffery A. Garofalo
10 Lisel M. Ferguson
11 Attorneys for Plaintiff
Upmann Sanchez Turf and Landscape

12 DATED: November 22, 2021

GILE LAW GROUP LTD.

14 By: /s/ Ryan Gile

15 Ryan Gile
16 Attorney for Defendant
US TURF, LLC

18 **IT IS SO ORDERED:**

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22 DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

23 DATED: November 23, 2021
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